

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS PRICING ANTITRUST LITIGATION	MDL 2724 16-MD-2724
THIS DOCUMENT RELATES TO: <i>ALL ACTIONS</i>	HON. CYNTHIA M. RUFE

**DEFENDANT TEVA PHARMACEUTICALS USA, INC.’S
MOTION TO EXTEND THE STAY REQUESTED IN ITS MOTION FOR
PROTECTIVE ORDER THROUGH MARCH 31, 2021 AND TO
ADD THREE INDIVIDUALS TO THE REQUESTED STAY**

On November 30, 2020, Teva Pharmaceuticals USA, Inc. (“Teva”) filed its Motion for Protective Order Temporarily Postponing Depositions of Seven Individuals (“Motion for Protective Order”), which seeks to stay the depositions of seven Teva Personnel through January 31, 2021.¹ ECF No. 1615. On January 29, 2021, and after Teva’s Motion for Protective Order was fully briefed and argued, the United States Department of Justice (“DOJ”) requested that its existing stay of depositions be extended through March 31, 2021. ECF No. 1665. [REDACTED]

[REDACTED] *Id.* For the reasons discussed below, Teva respectfully requests that (1) the stay requested in Teva’s Motion for Protective Order be extended to March 31, 2021, consistent with the relief sought in DOJ’s Joint Stipulation to Extend, and (2) [REDACTED]

[REDACTED]

¹ The seven individuals identified as the “Teva Personnel” are defined in Teva’s Motion for Protective Order. ECF No. 1615.

I. RELEVANT BACKGROUND

On November 25, 2020, the Court approved a Joint Stipulation by the Parties and the DOJ to stay the depositions of 70 individuals (the “DOJ Stay List”). PTO 147, ECF No. 1613. Thereafter, Teva moved for a limited stay of depositions for seven Teva Personnel who were not included in the DOJ Stay List. ECF No. 1615. The Parties submitted briefing and appeared before the Court for oral argument on January 14, 2021. ECF No. 1615; ECF No. 1629; ECF No. 1636.

On January 29, 2021, DOJ filed an unopposed joint stipulation seeking to extend the stay of depositions for 60 of the individuals on the DOJ Stay List until March 31, 2021 (the “Joint Stipulation to Extend”). ECF No. 1665. DOJ’s Joint Stipulation to Extend [REDACTED]

[REDACTED]
[REDACTED] *Id.*

II. ARGUMENT

In light of the relief sought in the DOJ’s Joint Stipulation to Extend, Teva respectfully moves to modify its Motion for Protective Order in two respects.

First, Teva respectfully requests that the stay Teva sought in its Motion for Protective Order be extended through March 31, 2021. This date is consistent with the date requested by DOJ’s Joint Stipulation to Extend.²

Second, Teva seeks to add three additional individuals [REDACTED]
[REDACTED] to the scope of its Motion for Protective Order. As noted

² While Teva currently seeks a stay of ten depositions through March 31, 2021, Teva previously advised the Court and Plaintiffs that, once a criminal trial date is set, it will seek to extend the limited stay of certain Teva depositions through the end of the criminal proceedings. ECF No. 1615, Def.’s Mot. to Stay 1; ECF No. 1636, Def.’s Reply n. 1.

above,

[REDACTED]

[REDACTED]

[REDACTED] PTO 147, ECF No. 1613. [REDACTED]

[REDACTED]

[REDACTED] for the reasons

set forth in its Motion for Protective Order. ECF Nos. 1615, 1636.

In further support of Teva's request to stay the depositions of the [REDACTED]

[REDACTED], Teva states the following:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *See supra* note 3.

III. CONCLUSION

For the foregoing reasons, Teva respectfully requests that the depositions of the seven Teva Personnel and three Teva Additional Personnel be stayed until March 31, 2021.

Dated: January 29, 2021

Respectfully submitted,

/s/ Alison Tanchyk

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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2021, I caused a copy of the foregoing to be served on counsel of record via the Court's CM/ECF system.

/s/ Alison Tanchyk
Alison Tanchyk

*Counsel for Defendant
Teva Pharmaceuticals USA, Inc.*